

EXHIBIT 6

Videotaped Deposition of
Elizabeth Tzetzso
March 15, 2023

Freeman

vs.

Deebs

Confidential



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Freeman vs.
Deebs

Elizabeth Tzetzso

1 Q. Is there one of those -- who -- how
2 do I ask this? Do all six of the people under
3 you -- and I guess the seven of you collectively, do
4 you all service all 14 of those clients or are
5 clients given to particular client service managers?

6 ATTORNEY WOLFF: Object to form.

7 You can answer just so it's clear.

8 ATTORNEY DONIGER: Not the best
9 question in the world.

10 A. We assign a client account manager to
11 each publisher.

12 Q. All right. Who is the client account
13 manager for Entangled?

14 A. Veronica Gonzalez.

15 Q. And just to be clear, you didn't
16 speak with Ms. Gonzalez today to gather any
17 information for this deposition?

18 A. I did not.

19 Q. All right.

20 (Whereupon, previously marked
21 document entitled Distribution Agreement,
22 MAC0000099, is received and marked as Exhibit 55 for
23 Identification.)

24 BY ATTORNEY DONIGER:

25 Q. So I'm going to hand you what's been

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Elizabeth Tzetzio

1 previously marked as exhibit 55. It's a copy of the
2 distribution agreement, the original distribution
3 agreement for 2013 between Entangled and Macmillan.

4 Have you seen this document before?

5 A. I have.

6 Q. All right. And do I understand
7 correctly that pursuant to the terms of this
8 agreement, Macmillan is the exclusive distributor
9 for Entangled?

10 A. Yes.

11 ATTORNEY WOLFF: Object to the form.

12 You can answer.

13 THE WITNESS: Okay.

14 ATTORNEY WOLFF: You can answer.

15 A. Yes, we are the exclusive
16 distributor.

17 BY ATTORNEY DONIGER:

18 Q. All right.

19 And, in fact, under grant -- I'm just
20 reading the first sentence. It says: By entering
21 into this agreement, the publisher grants Macmillan
22 for the term of this agreement the exclusive right
23 to distribute throughout the world all print books
24 and e-books that are published or scheduled for
25 publication by the publisher during the term of this

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1 agreement.

2 It goes on a bit from there.

3 You understand that to mean, just
4 sort of like the plain language definition, that
5 everything that they put out, publish, you
6 distribute for them in terms of books and e-books;
7 right?

8 A. Yes.

9 Q. How many -- do you know how many
10 books Macmillan is currently distributing for
11 Entangled?

12 A. I do not. I'd have to do a little
13 bit of research.

14 Q. Okay. Do you have any estimate?

15 A. We publish about 60 to 70 new
16 physical books a year and hundreds of e-books each
17 year.

18 Q. Okay. For Entangled?

19 A. For Entangled.

20 Q. All right. And Ms. Gonzalez would be
21 overseeing all of that?

22 A. Yes.

23 Q. And it was pursuant to this
24 agreement, exhibit 55, that Macmillan has
25 distributed the Crave series; right?

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1 A. Yes.

2 Q. And I understand there have been a
3 few amendments to this agreement. Those have all
4 been put into evidence. I'm not going to waste your
5 time with them, but they are what they are. Okay.

6 So since 2013, Macmillan has been
7 consistently distributing for Entangled; right?

8 A. Yes.

9 Q. What is an ISBN number?

10 A. An ISBN number is the identifier for
11 each book. It's the standard identifier for the
12 book publishing industry.

13 Q. Who assigns the ISBN numbers, if you
14 know?

15 A. I don't want to give you incorrect
16 information. I don't know.

17 Q. Yeah, and that's perfectly fine. "I
18 don't know" is always a perfectly fine answer.

19 A. Yeah.

20 Q. All right.

21 ATTORNEY DONIGER: So let's go ahead
22 and mark -- what are we on?

23 CERTIFIED STENOGRAPHER: 76 is next.

24 ATTORNEY DONIGER: Go ahead and mark
25 as 76 a document that was produced in discovery by